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November 17, 2020

BY ECF

The Honorable Analisa Torres
United States District Judge
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *The New York Times Company et al. v. Department of the Treasury*, 19 Civ. 9669
(AT)

Dear Judge Torres:

I write respectfully on behalf of all parties in the above-referenced action brought under the Freedom of Information Act, 5 U.S.C. § 552 (“FOIA”), to provide the status update ordered by the Court on October 16, 2020, and to request an adjournment of the telephonic conference scheduled for November 24, 2020, at 10:30 AM. *See* Dkt. No. 33 (mem. endorsement).

On October 15, 2020, the parties submitted a joint letter in which they informed the Court that they were continuing to confer about modifications to Plaintiffs’ FOIA request that may resolve part or all of this case. Dkt. No. 32. Since the parties submitted that letter, they have continued to confer and have made progress towards agreeing on a set of search terms.

The parties respectfully request an additional 30 days to continue their efforts to reach an agreement. Further, the parties respectfully propose that they submit a joint status letter updating the Court on their efforts and proposing next steps in this case by December 16, 2020, and that the telephonic conference scheduled for November 24, 2020, be adjourned to a date and time



after December 16, 2020, that is convenient for the Court. This is the parties' eleventh request for an adjournment of the initial conference. The first ten requests were granted. Dkt. Nos. 14, 16, 19, 21, 23, 25, 27, 29, 31, 33.

I thank the Court for its consideration of these requests.

Respectfully submitted,

By: /s/ Charles Crain

Charles Crain, Supervising attorney
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ABRAMS INSTITUTE
Yale Law School
P.O. Box 208215
New Haven, CT 06520-8215
Tel: (203) 436-5824
Fax: (203) 432-3034
Email: charles.crain@yale.edu

GRANTED. The initial pretrial conference scheduled for November 24, 2020, is ADJOURNED to **December 17, 2020**, at **10:00 a.m.** By **December 10, 2020**, the parties shall file a joint status letter.

SO ORDERED.

Dated: November 20, 2020
New York, New York

A handwritten signature in black ink, appearing to read "Analisa", is positioned above a horizontal line.

ANALISA TORRES
United States District Judge